

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
Charter School Capital, Inc., <sup>1</sup>	:	Case No. 25-11016 (CTG)
	:	
Debtor.	:	
	:	
	X	

**AMENDED<sup>2</sup> NOTICE OF AGENDA FOR MATTERS SCHEDULED  
FOR HEARING ON JULY 2, 2025 AT 11:00 A.M. (ET)<sup>3</sup>**

**This proceeding will be conducted in-person in Courtroom No. 5 on the 5th Floor. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Goldblatt's Chambers Procedures (<https://www.deb.uscourts.gov/content/judge-craig-t-goldblatt>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements.**

**Registration is required by 4:00 p.m. (ET) the business day before the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website.**

**RESOLVED MATTERS:**

1. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Insurance Programs and Pay all Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [[Docket No. 3](#) – filed June 8, 2025]

**Response/Objection Deadline:**

June 25, 2025 at 4:00 p.m. (ET)

---

<sup>1</sup> The Debtor's mailing address is 9450 SW Gemini Dr, PMB 559064, Beaverton, OR 97008-7105, and the last four digits of the Debtor's federal tax identification number are 4278.

<sup>2</sup> **All amended items are in bold.**

<sup>3</sup> All motions and other pleadings referenced herein are available online at the following address: [Charter School Capital, Inc. Overview Case: 25-11016 | Epiq.](#)

Responses/Objections Received: None.

Related Documents:

- A. Interim Order (I) Authorizing the Debtor to (A) Maintain Existing Insurance Programs and Pay all Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [[Docket No. 27](#) – entered June 9, 2025]
- B. Omnibus Notice of Second Day Hearing to be Held on July 2, 2025 at 11:00 a.m. (ET) [[Docket No. 28](#) – filed June 9, 2025]
- C. Certificate of No Objection Regarding Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Insurance Programs and Pay all Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [[Docket No. 65](#) – filed June 29, 2025]
- D. Final Order (I) Authorizing the Debtor to (A) Maintain Existing Insurance Programs and Pay all Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [[Docket No. 81](#) - entered June 30, 2025]

Status: An order has been entered. No hearing is necessary.

- 2. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing, but Not Directing, the Debtor to (A) Pay Prepetition Wages, Compensation, Employee Benefits, and Other Workforce Obligations and (B) Continue Certain Employee Benefit Programs in the Ordinary Course; (II) Authorizing all Banks to Honor Prepetition Checks for Payments of Prepetition Workforce Obligations; and (III) Granting Related Relief [[Docket No. 4](#) – filed June 8, 2025]

Response/Objection Deadline: June 25, 2025 at 4:00 p.m. (ET)

Responses/Objections Received: None.

Related Documents:

- A. Notice of Filing of Revised Proposed Interim Order (I) Authorizing, but Not Directing, the Debtor to (A) Pay Prepetition Wages, Compensation, Employee Benefits, and Other Workforce Obligations and (B) Continue Certain Employee Benefit Programs in the Ordinary Course; (II) Authorizing all Banks to Honor

Prepetition Checks for Payment of Prepetition Workforce Obligations; and (III) Granted Related Relief [[Docket No. 16](#) – filed June 9, 2025]

- B. Interim Order (I) Authorizing , But Not Directing, the Debtor to (A) Pay Prepetition Wages, Compensation, Employee Benefits, and Other Workforce Obligations and (B) Continue Certain Employee Benefit Programs in the Ordinary Course; (II) Authorizing all Banks to Honor Prepetition Checks for Payment of Prepetition Workforce Obligations; and (III) Granting Related Relief [[Docket No. 24](#) – entered June 9, 2025]
- C. Omnibus Notice of Second Day Hearing to be Held on July 2, 2025 at 11:00 a.m. (ET) [[Docket No. 28](#) – filed June 9, 2025]
- D. Certificate of No Objection Regarding Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtor to (A) Pay Prepetition Wages, Compensation, Employee Benefits, and Other Workforce Obligations and (B) Continue Certain Employee Benefit Programs in the Ordinary Course; (II) Authorizing all Banks to Honor Prepetition Checks for Payments of Prepetition Workforce Obligations; and (III) Granting Related Relief [[Docket No. 61](#) – filed June 29, 2025]
- E. Final Order (I) Authorizing, But Not Directing, the Debtor to (A) Pay Prepetition Wages, Compensation, Employee Benefits, and Other Workforce Obligations and (B) Continue Certain Employee Benefit Programs in the Ordinary Course; (II) Authorizing all Banks to Honor Prepetition Checks for Payments of Prepetition Workforce Obligations; and (III) Granting Related Relief [[Docket No. 77](#) - entered June 30, 2025]

Status: An order has been entered. No hearing is necessary.

- 3. Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Operate its Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto (C) Continue to Perform its Intercompany Transactions, and (D) Maintain Existing Business Forms; (II) Authorizing the Debtor’s Banks to Honor all Related Payment Requests; and (III) Granting Related Relief [[Docket No. 5](#) – filed June 8, 2025]

Response/Objection Deadline: June 25, 2025 at 4:00 p.m. (ET)

Responses/Objections Received: None.

Related Documents:

- A. Notice of Filing of Revised Proposed Interim Order (I) Authorizing the Debtor to (A) Continue to Operate its Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Continue to Perform its Intercompany Transactions, and (D) Maintain Existing Business Forms;

(II) Authorizing the Debtor's Bank to Honor all Related Payment Requests; and (III) Granting Related Relief [[Docket No. 19](#) – filed June 9, 2025]

- B. Interim Order (I) Authorizing the Debtor to (A) Continue to Operate its Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Continue to Perform its Intercompany Transactions, and (D) Maintain Existing Business Forms; (II) Authorizing the Debtor's Banks to Honor all Related Payment Requests; and (III) Granting Related Relief [[Docket No. 25](#) – entered June 9, 2025]
- C. Omnibus Notice of Second Day Hearing to be Held on July 2, 2025 at 11:00 a.m. (ET) [[Docket No. 28](#) – filed June 9, 2025]
- D. Certificate of No Objection Regarding Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Operate its Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto (C) Continue to Perform its Intercompany Transactions, and (D) Maintain Existing Business Forms; (II) Authorizing the Debtor's Banks to Honor all Related Payment Requests; and (III) Granting Related Relief [[Docket No. 62](#) – filed June 29, 2025]
- E. Final Order (I) Authorizing the Debtor to (A) Continue to Operate its Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto (C) Continue to Perform its Intercompany Transactions, and (D) Maintain Existing Business Forms; (II) Authorizing the Debtor's Banks to Honor all Related Payment Requests; and (III) Granting Related Relief [[Docket No. 78](#) - entered June 30, 2025]

Status: An order has been entered. No hearing is necessary.

- 4. Debtor's Motion for Entry of an Order, Pursuant to Sections 105(a), 365(a), and 544 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Debtor to Reject a Certain Unexpired Lease and Certain Contracts Effective as of the Petition Date; (II) Abandoning any Remaining Personal Property Located at the Leased Premises; and (III) Granting Certain Related Relief [[Docket No. 6](#) – filed June 8, 2025]

Response/Objection Deadline: June 25, 2025 at 4:00 p.m. (ET)

Responses/Objections Received: None.

Related Documents:

- A. Notice of Hearing Regarding Debtor's Motion for Entry of an Order Pursuant to Sections 105(a), 365 (a), and 544 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Debtor to Reject a Certain Unexpired Lease and Certain Contracts Effective as of the Petition Date; (II) Abandoning any Remaining

Personal Property Located at the Leased Premises; and (III) Granting Certain Related Relief [[Docket No. 29](#) – filed June 9, 2025]

- B. Certificate of No Objection Regarding Debtor's Motion for Entry of an Order, Pursuant to Sections 105(a), 365(a), and 544 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Debtor to Reject a Certain Unexpired Lease and Certain Contracts Effective as of the Petition Date; (II) Abandoning any Remaining Personal Property Located at the Leased Premises; and (III) Granting Certain Related Relief [[Docket No. 60](#) – filed June 29, 2025]
- C. Final Order (I) Authorizing the Debtor to Reject a Certain Unexpired Lease and Certain Contracts Effective as of the Petition Date; (II) Abandoning any Remaining Personal Property Located at the Leased Premises; and (III) Granting Certain Related Relief [[Docket No. 76](#) - entered June 30, 2025]

Status: An order has been entered. No hearing is necessary.

- 5. Debtor's Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [[Docket No. 51](#) – filed June 18, 2025]

Response/Objection Deadline:

June 25, 2025 at 4:00 p.m. (ET);  
extended to June 27, 2025 for the U.S.  
Trustee

Responses/Objections Received:

- i. Informal Comments from the U.S. Trustee

Related Documents:

- A. Certification of Counsel Regarding Debtor's Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [[Docket No. 64](#) – filed June 29, 2025]
- B. Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [[Docket No. 80](#) - entered June 30, 2025]

Status: An order has been entered. No hearing is necessary.

- 6. Debtor's Motion for Entry of an Order (I) Authorizing Debtor to Employ Professionals Utilized in the Ordinary Course of Business (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief [[Docket No. 52](#) – filed June 18, 2025]

Response/Objection Deadline:

June 25, 2025 at 4:00 p.m. (ET);  
extended to June 27, 2025 for the U.S.  
Trustee

Responses/Objections Received:

- i. Informal Comments from the U.S. Trustee

Related Documents:

- A. Certification of Counsel Regarding Debtor's Motion for Entry of an Order (I) Authorizing Debtor to Employ Professionals Utilized in the Ordinary Course of Business (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief [[Docket No. 63](#) – filed June 29, 2025]
- B. Order (I) Authorizing Debtor to Employ Professionals Utilized in the Ordinary Course of Business (II) Waiving Certain Information Requirements of Local Rule 2016-1, and (III) Granting Related Relief [[Docket No. 79](#) - entered June 30, 2025]

Status: An order has been entered. No hearing is necessary.

**MATTERS GOING FORWARD:**

- 7. Debtor's Motion for Entry of Orders (I)(A) Approving Bidding Procedures for the Sale of Substantially all of the Debtor's Assets, (B) Authorizing the Debtor to Designate One or More Stalking Horse Bidders and to Provide Bid Protections, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof and (F) Granting Related Relief; and (II)(A) Approving Sale of the Debtor's Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [[Docket No. 32](#) – filed June 11, 2025]

Response/Objection Deadline:

June 25, 2025 at 4:00 p.m. (ET);  
extended to June 27, 2025 for the U.S.  
Trustee

Responses/Objections Received:

- i. Informal Comments from the U.S. Trustee
- ii. Limited Objection and Reservation of Rights of Orthogon Charter School Special Opportunities LLP, Orthogon Charter School Special Opportunities II, LP and Orthogon Charter School Special Opportunities III, LLC to Debtor's Motion for Entry of an Orders (I)(A) Approving Bidding Procedures for the Sale of Substantially all of the Debtor's Assets, (B) Authorizing the Debtor to Designate One or More Stalking Horse Bidders and to Provide Bid Protections,

(C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof and (F) Granting Related Relief; and (II)(A) Approving Sale of the Debtor's Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [[Docket No. 55](#) – filed June 25, 2025]

Related Documents:

- A. Declaration of Brian Ayers in Support of Debtor's Motion for Entry of Orders (I)(A) Approving Bidding Procedures for the Sale of Substantially all of the Debtor's Assets, (B) Authorizing the Debtor to Designate One or More Stalking Horse Bidders and to Provide Bid Protections, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof and (F) Granting Related Relief; and (II) (A) Approving Sale of the Debtor's Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [[Docket No. 33](#) – filed June 11, 2025]
- B. Notice of Filing of Revised Bidding Procedures Order [[Docket No. 70](#) – filed June 29, 2025]
- C. Debtor's Reply to Orthogon's Objection to Bidding Procedures Motion [[Docket No. 71](#) – filed June 29, 2025]
- D. Supplemental Declaration of Brian Ayers in Support of the Bidding Procedures Motion and Debtor's Reply [[Docket No. 72](#) – filed June 29, 2025]
- E. Motion of the Debtor for Leave to File and Serve a Late Reply in Support of the Debtor's Bidding Procedures Motion [[Docket No. 73](#) – Filed June 29, 2025]
- F. Debtor's Witness and Exhibit List for Hearing on July 2, 2025 [[Docket No. 83](#) - filed June 30, 2025]
- G. **Certification of Counsel Debtor's Motion for Entry of Orders (I)(A) Approving Bidding Procedures for the Sale of Substantially all of the Debtor's Assets, (B) Authorizing the Debtor to Designate One or More Stalking Horse Bidders and to Provide Bid Protections, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof and (F) Granting Related Relief; and (II)(A) Approving Sale of the Debtor's Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Approving the Assumption and Assignment of Certain Executory**



**Contracts and Unexpired Leases, and (C) Granting Related Relief [[Docket No. 87](#) - filed July 2, 2025]**

**Status: A revised proposed order has been filed under Certification of Counsel, which resolves the informal comments from the U.S. Trustee and the Limited Objection and Reservation of Rights of Orthogon Charter School Special Opportunities LLP, Orthogon Charter School Special Opportunities II, LP and Orthogon Charter School Special Opportunities III, LLC. This matter is resolved.**

8. Debtor's Emergency Motion for Entry of Interim and Final Orders (A) Authorizing Debtor to Obtain Post-Petition Financing and to Grant Security Interests and Super-Priority Administrative Expense Status Pursuant to 11 U.S.C. §§ 105, 346(c) and 364(d); (B) Utilize Cash Collateral and Pay Certain Related Fees and Charges; (C) Modifying the Automatic Stay Pursuant to U.S.C. § 362; and (D) Scheduling and Final Hearing Pursuant to Bankruptcy Rule 4001 [[Docket No. 57](#) – filed June 29, 2025]

Response/Objection Deadline: At the Hearing.

Responses/Objections Received: None at this time.

Related Documents:

- A. Declaration of Brian Ayers in Support of Debtor's Emergency Motion for Entry of Interim and Final Orders (A) Authorizing Debtor to Obtain Post-Petition Financing and to Grant Security Interests and Super-Priority Administrative Expense Status Pursuant to 11 U.S.C. §§ 105, 346(c) and 364(d); (B) Utilize Cash Collateral and Pay Certain Related Fees and Charges; (C) Modifying the Automatic Stay Pursuant to U.S.C. § 362; and (D) Scheduling and Final Hearing Pursuant to Bankruptcy Rule 4001 [[Docket No. 58](#) – filed June 29, 2025]
- B. Order Shortening the Notice and Objection Periods with Respect to Debtor's Emergency Motion for Entry of Interim and Final Orders (A) Authorizing Debtor to Obtain Post-Petition Financing and to Grant Security Interests and Super-Priority Administrative Expense Status Pursuant to 11 U.S.C. §§ 105, 346(c) and 364(d); (B) Utilize Cash Collateral and Pay Certain Related Fees and Charges; (C) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362; and (D) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 [[Docket No. 66](#) – filed June 29, 2025]
- C. Debtor's Witness and Exhibit List for Hearing on July 2, 2025 [[Docket No. 83](#) - filed June 30, 2025]

Status: This matter is going forward.



Dated: July 2, 2025  
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ Brett M. Haywood

Aaron H. Stulman (No. 5807)  
Brett M. Haywood (No. 6166)  
James R. Risener III (No. 7334)  
Ethan H. Sulik (No. 7270)  
1313 North Market Street, 6<sup>th</sup> Floor  
Wilmington, Delaware 19801  
Tel: (302) 984-6000  
Facsimile: (302) 658-1192  
Email: astulman@potteranderson.com  
bhaywood@potteranderson.com  
jrisener@potteranderson.com  
esulik@potteranderson.com

- and -

GOODWIN PROCTER LLP

Howard S. Steel (admitted *pro hac vice*)  
Stacy Dasaro (admitted *pro hac vice*)  
Kizzy L. Jarashow (admitted *pro hac vice*)  
James Lathrop (admitted *pro hac vice*)  
The New York Times Building  
620 Eighth Avenue  
New York, New York 10018-1405  
Tel: (212) 813-8800  
Facsimile: (212) 355-3333  
Email: hsteel@goodwinlaw.com  
sdasaro@goodwinlaw.com  
kjarashow@goodwinlaw.com  
jlathrop@goodwinlaw.com

*Proposed Counsel for Debtor and Debtor-in-Possession*